

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et al.*,

Debtors.¹

PROMESA Title III

Case No. 17-03283 (LTS)

(Jointly Administered)

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

PUERTO RICO ELECTRIC POWER AUTHORITY,

Debtor.

PROMESA Title III

Case No. 17-4780-LTS

**NATIONAL PUBLIC FINANCE GUARANTEE CORPORATION'S NOTICE OF
INTENT TO PARTICIPATE IN DISCOVERY FOR CONFIRMATION OF
PREPA PLAN OF ADJUSTMENT**

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority ("PREPA") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority ("PBA") (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

National Public Finance Guarantee Corporation (“National” or “Participant”) hereby submits this Notice of Intent to Participate in Discovery for Confirmation of the *Second Amended Title III Plan of Adjustment of the Puerto Rico Electric Power Authority* [ECF No. 3278], as may be amended, modified, or supplemented, pursuant to the Court’s *Amended and Restated Order Establishing, Among Other Things, Procedures and Deadlines Concerning Objections to Confirmation and Discovery in Connection Therewith* [ECF No. 3305], and respectfully states as follows:

1. Participant’s contact information, including e-mail address, and that of its counsel:

Participant’s Name: National Public Finance Guarantee Corporation

Participant’s Address: 1 Manhattanville Road, Suite 301
Purchase, NY 10577

Names and Addresses of Counsel:

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2. Participant’s Claim numbers and the nature of Participant’s Claim:

Claim Numbers: 22078; 23396; 18449 (filed by U.S. Bank National Association as PREPA bond Trustee)

Nature of Claim:

National is a New York insurance company that insures approximately \$710.3 million of PREPA bonds (as of March 31, 2023). National has already paid claims under its PREPA bond

insurance policies totaling approximately \$836.7 million. National's Claim is subject to settlement as summarized below.

On February 2, 2023, the Financial Oversight and Management Board (the "Board"), on behalf of itself and as the sole Title III representative of PREPA, and National entered into the *PREPA Plan Support Agreement* (the "PREPA PSA") regarding the treatment of the PREPA Bonds in a plan of adjustment to be filed by the Board in accordance with the terms and provisions of the PREPA PSA. The PREPA PSA embodies an agreement to settle disputes related to: (a) Insured Bond Claims and Asserted Reimbursement Claims held by National, and (b) related claims asserted and relief sought in various matters concerning the PREPA bonds. This Court has stayed such matters as to National on the joint motion of the Board and National [ECF No. 3343].

National respectfully submits this Notice to preserve its rights to participate in discovery in connection with confirmation of the PREPA plan of adjustment.

RESPECTFULLY SUBMITTED, this 7th day of April 2023.

WE HEREBY CERTIFY that on this same date a true and exact copy of this motion was filed with the Clerk of Court using the CM/ECF system, which will notify a copy to counsel of record. Also, a copy of this document will be notified via electronic mail to all case participants.

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**ADSUAR MUÑOZ GOYCO
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